

Comments on the FY 2008 – 2011 STIP

Introduction

1. Page 2, the section in bold print gives the impression that the STIP includes only the areas outside of MPOs rather than being the umbrella program that includes all projects likely to be implemented in the next four years.
2. The STIP is a “program” of projects not a “plan.” Please correct the header throughout the document.

MDOT Five-Year Transportation Program 2007-2011

1. Page 10, Paragraph before Metropolitan Planning, reference is made to declining state revenue dedicated to transportation. In the MTPA subcommittee on year of expenditure dollars, Eric Mullen indicated that state revenues have not declined but have remained flat for the past few years. Which is it?

Metropolitan Planning

1. Page 10, references to SAFETEA-LU should be changed to 23 U.S.C. Section 134
2. Page 11, first paragraph, 23 USC 134 and 23 CFR 450, subpart 3 require that MPO plans be more detailed than the state long range plan. This is not just an air quality conformity issue.
3. Page 11, Table 1, to be consistent with the other listings, shouldn't the Jackson Area Comprehensive Transportation Study (JACTS) be listed instead of the Region 2 Planning Commission?

Environmental Justice

1. Page 19, Table 2, the total number of projects adds up to 575 not 640 as shown and the resultant percent projects in EJ zones is 84% not 93%
2. Page 19, Table 2, the total cost of all projects adds up to \$728,745,933 not \$706,176,629 as shown and the resultant percent costs in EJ zones is 77% not 80%
3. Page 20, the discussion of the receipt of beneficial effects needs to be changed to reflect the corrections to Table 2.

Air Quality Analysis

1. Page 25, fourth paragraph, Allegan County is not exempt from conformity. Part of Allegan County is within the Holland urbanized area boundary, so all of Allegan County is analyzed as part of the MACC air quality analysis.

Financial Plan

1. Primary Concerns - Agreement on the following is needed before we can approve the STIP:
 - Document the cooperative development of revenue estimates and funding targets with the MPOs.
 - Total of proposed commitments must come from e-STIP.
 - Address apparent over estimation of Federal revenue for FY 2008.
 - Clarify approach for AC – include updated revenue graphics.
2. Page 25, last paragraph - The STIP is a listing of projects not a summary.
3. Page 25 - FHWA must take action on the STIP. The STIP document is the umbrella for all of the parts. The reference at the bottom of page 25 to this report being just the non-metro projects and the reference to being consistent with the state long-range plan unintentionally conveys a message that the STIP is not an umbrella document and that the TIPs are somehow disconnected from the STIP.
 - Projects in urbanized areas must be consistent with metro area plans developed cooperatively by State and local officials.
 - The capital investment total for the STIP includes non-metro projects in the table on pages 37 through 49 and the projects listed in the metro areas TIPs which are incorporated in the STIP by reference.
4. Page 26 – Sometimes we get so focused on the mechanics of demonstrating financial constraint, we forget that the main objective is to establish priorities to keep the program within estimated available revenues. The main objective is missing in the discussion at the top of page 26.
5. Page 26, New Resources – The Financial Plan must describe the assumptions and method for estimating available and anticipated revenue shown in Table 6. This section must describe the cooperative process with the MPOs, including appropriate charts and tables, for forecasting and distributing revenue by year.
6. Page 26 and 27, Operations and Maintenance –
 - There are numerous errors in Table 4. For example the Operations and Maintenance costs shown for 2011 are the sum of the O & M costs for 2008 through 2010, the Capital Outlay amounts for 2008, 2009, and 2010 are incorrect
 - It would be more informative to deduct the O&M costs from the State Revenue and then add in the Federal Revenue to get the Capital Outlay totals
 - The numbers in Table 4 do not match the numbers in Table 6
 - The basis for the estimates must be described.
 - Preservation is not part of Operations and Maintenance.
7. Page 27 and 28, AC – The discussion on AC is confusing; it does not reflect past practice. Several years ago we agreed on an approach for AC conversions that eliminated the need for a second listing at the time of conversion for most MDOT AC projects. Such approach identified an estimated amount of Federal revenue to be used for conversion and the amount that would be available for obligation for new

Federal-aid projects. Such data were displayed in a revenue graphic. We have not been informed of a change in MDOT procedures. If MDOT will require a second listing for specific projects advance construct conversions, let's be clear as to which projects are included in that group and which are not. Assuming there is no change for MDOT projects, the revenue graphic must be included in keeping with our earlier agreement. We have some ideas on how to improve the graphic.

8. Page 28, Financial Constraint – As mentioned in comment 5, the approach and assumptions for estimating available revenue must be included. If there is a separate detailed report, it must be summarized in the financial plan and referenced or included as an appendix. We see no reason for excluding revenue for project groups to be added later. If we can agree on the revenue upfront, there would be little need to make revenue adjustments (additions) or answer the question, where did the revenue come from?
9. Page 28, Financial Constraint – The third sentence of the first paragraph suggests that program adjustments would be needed whenever a revenue estimate is changed. We believe that program adjustments would be needed only if the revised revenue estimates were substantially different than the original estimates
10. Page 28, Financial Constraint – Under the planning regulations “project selection” is a tool for managing the STIP (and its TIP subparts) once the STIP is developed.
11. Page 29, Item 4 – GPAs are not created by formula!
12. Page 29, last bullet – Each component of the STIP, as well as the overall document must be constrained. Make reference to the MPO TIPs.
13. Page 29 – Add to key elements:
 - The total cost of proposed commitments must come from the STIP/TIP document.
 - The revenue estimate is developed cooperatively with the MPOs and is documented in the financial plan.
 - All available revenues are included (including revenue for projects in GPAs where the specific projects are yet to be identified).
14. Page 30, first bullet – Statewide programs can be included in the rural tables only to the extent that such listing does not include projects in urbanized areas.
15. Page 30, second bullet – We agree with this bullet, but it seems to contradict the AC information on pages 27 and 28 which we said was confusing. See comment 7.
16. Page 30, last paragraph – The program is based on estimates of both revenues and commitments. Once we agree upon a revenue estimate, the program can remain static unless there are substantial differences between the original revenue estimates and any revised revenue estimates.

17. Page 33, Table 6a:

- Federal funds seems to be over estimated FY 2008 by \$826 Million Dollars (\$655 million of non FHWA federal and \$171 million of extra FA).
- According to the July Advance Notice of Anticipated Apportionments for FY 2008 new Federal revenue (less PL) totals about \$1.058 billion not the \$1.229 billion shown.
- The revenue estimates for the IM and STP programs exceed by substantial amounts the new revenue expected to be available.
- What is the source of the estimated \$655 million in non FHWA federal funds?
- The revenue column does not appear to have been adjusted for AC conversions, so the over estimation may be even higher.
- The proposed commitment column numbers must come from the uniform e-STIP automated summaries.

18. Pages 40, 41, 43, 44, & 46: Small Urban Program and Rural Task Force Program – At least 84 rural or small urban local projects were advance constructed in FY 2007 under the Jobs Today program with conversions to occur within this STIP. How is the conversion of these projects being accounted for?